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RCRA/SUPERFUND HOTLINE MONTHLY SUMMARY

NOVEMBER 84

Regulation of Recirculating Tank

3. An owner/operator is not sure whether or how a recirculating tank that feeds caustic to an incinerator scrubber is regulated. The purpose of the caustic is to neutralize the acids formed by the incineration process. Initially, the tanks holds caustic product (not waste) that is circulated through the scrubber and back to the tank. The tank is emptied 1-7 days later, depending on the pH of the mixture and its ability to neutralize scrubber acids. the mixture in the tank after circulation may not always exhibit the corrosive Subpart C characteristic (D002). The permit for in incinerator cannot address standards for the tank as an ancillary piece of equipment because the incinerator burns characteristic waste only. Incinerators that burn only corrosive (D002) or ignitable (D001) characteristic waste or both are excluded from all operating standards except closure and waste analysis per §264.340(b). Would the tank be viewed as a product or process unit excluded by §261.4(c) even though the liquid waste from the scrubber is returned to the tank?

Since the waste in the tank is not generated in the tank (e.g., sludge developing in a product tank), 261.4(c) does not apply. The tank could qualify for the special standards in §262.34, however, since it is drained before 90 days.

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